

**Exhibit A**

Shannon Declaration

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
SABINE STORAGE & OPERATIONS, INC	)	Case No. 22-30670
Debtor.	)	Chapter 11 (Subchapter V)

**DECLARATION OF R. J. SHANNON IN SUPPORT OF  
THE DEBTOR'S APPLICATION TO EMPLOY  
SHANNON & LEE LLP AS BANKRUPTCY COUNSEL**

I, Robert Joseph Shannon, declare under penalty of perjury as follows:

1. I am an attorney at law duly admitted and in good standing to practice in the State of Texas and the State of Maryland, before the United States Court of Appeals for the Fifth Circuit, and the United States District Courts for the Southern, Northern, Eastern, and Western Districts of Texas. I am an attorney with the law firm Shannon & Lee LLP (the "SL Firm"), with its principal office located at 700 Milam Street, Suite 1300, Houston, Texas 77002.

2. I am making this declaration in support of the Debtor's Application to Employ Shannon & Lee LLP as Bankruptcy Counsel Effective June 1, 2022 (the "Application"). Unless otherwise indicated, capitalized terms used but not defined herein have the meanings ascribed to them in the Application.

3. Except as otherwise noted, all facts set forth in this declaration are based upon my personal knowledge, upon the client and matter records of the SL Firm reviewed by me, or derived from information available to me that I believe to be true and correct.

**C. Scope of Services**

4. Pursuant to the Legal Services Agreement, the Application, and the Proposed Order attached thereto, the SL Firm will serve as bankruptcy counsel to the Debtor in connection with

the above-captioned bankruptcy case. In connection with this representation, the SL Firm will take all necessary and appropriate actions to administer the Debtor's chapter 11 bankruptcy estate and obtain confirmation of a plan of reorganization.

#### **D. Proposed Compensation**

5. The SL Firm will apply to the Court for allowance of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, including §§ 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, Guidelines, and Orders for all services performed and expenses incurred during its representation of the Debtor.

6. Subject to the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, the Guidelines, and the Orders, the SL Firm intends to request the allowance of its compensation as set out in the Engagement Agreement and as summarized in the following chart:

<b>BILLER</b>	<b>RATE</b>
Kyung S. Lee	\$850
R. J. Shannon	\$625
Paralegals	\$180 - \$250
Legal Assistants	\$50-\$75

7. These rates reflect the rates that the SL Firm ordinarily charges clients in bankruptcy and non-bankruptcy matters and are less than or equal to the rates of similarly skilled and experience attorneys in this district. They also reflect the same rates that the attorneys at the SL Firm charged for services while representing the Debtor at Parkins & Rubio LLP (f/k/a Parkins Lee & Rubio LLP). The SL Firm submits that these agreed terms of reimbursement, compensation, and hourly rates are reasonable. The SL Firm will notify the Debtor and the U.S. Trustee ten (10) business days' notice of any change in the hourly rates charged for services rendered.

#### **E. Retainer & Prepetition Payments**

8. The Legal Services Agreement does not provide for any retainer to be paid to the SL Firm for this representation. The prepetition retainer provided to PRLLP was exhausted prior to the Petition Date.

#### **F. Disclosure of Connections**

9. The SL Firm performed the following actions to determine whether it or any of its attorneys has any disclosable connections, to the Debtor, creditors, any other party in interest, their respect attorneys and accountants, the U.S. Trustee, any person employed in the office of the U.S. Trustee, or any of the judges for the U.S. Bankruptcy Court for the Southern District of Texas:

- a. First, I personally sent an email to all email account holders within the SL Firm requesting the recipient respond to any representation known to be adverse or otherwise connected to the Debtor or its estate. Neither I nor my staff received any responses indicating that a conflict or connection exists.
- b. Second, I conducted a computerized search of all former clients of the SL Firm and its attorneys using the list of parties in interest listed in Schedule 1 hereto.
- c. Third, a list of connections and potential connections was created to investigate whether such connections amounted to disqualifying interests.

10. The search and my personal knowledge uncovered the following connections:

- a. Sabine Storage & Operations, Inc.—Mr. Lee and Mr. Shannon formerly represented the Debtor in this chapter 11 case while practicing at PRLLP.
- b. Parkins & Rubio LLP—Mr. Lee was formerly a partner of PRLLP. Mr. Shannon was formerly an employee of PRLLP.

11. Additionally, SL Firm attorneys have interacted with attorneys and law firms representing parties in interest in this case in other bankruptcy cases and in professional organizations unrelated to the Debtor's bankruptcy case.

12. The results of the foregoing connections search process confirm that neither I, the SL Firm, nor any of its employees or partners, to the best of my knowledge, have any disqualifying connections. The SL Firm does not have any debt or equity securities in the Debtor, is not an insider of the Debtor, and was not a creditor of the Debtor on the Petition Date.

13. The SL Firm or its attorneys may have provided services to creditors or other parties in interest inadvertently omitted from Schedule 1 or the description above. To the extent that such connections exist, they would be on matters wholly unrelated to the services for which the Debtor seeks to engage the SL Firm.

#### **G. Affirmative Statement of Disinterestedness**

14. Based on the connections review conducted to date and described herein, to the best of my knowledge and insofar as I am able to ascertain, the SL Firm is a “disinterested person” within the meaning of Bankruptcy Code § 101(14), as modified by Bankruptcy Code § 1107(b), as required by Bankruptcy Code § 327(a). The SL Firm is not a creditor, an equity security holder, or an insider of the Debtor; the SL Firm is not and was not within 2 years before the Petition Date a director, officer, or employee of the Debtor; and the SL Firm does not have any interest materially adverse to the interests of the Debtor’s bankruptcy estate or any class of creditors or equity security holders.

#### **H. Bankruptcy Rule 2016(b) Disclosures**

15. Pursuant to Bankruptcy Code § 504 and Bankruptcy Rule 2016, the SL Firm has not shared or agreed to share (a) any of its compensation from the representation of the Debtor with any other persons or (b) any compensation any other persons have received, may have received, or will receive.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 21, 2022,

By: /s/ R. J. Shannon  
R. J. Shannon

**SCHEDULE 1 TO SHANNON DECLARATION**

**SEARCHED PARTIES**

**Debtor & Professionals**

Sabine Storage & Solutions, Inc.  
Hirsch & Westheimer, P.C. (former)  
Parkins & Rubio LP

Nommensen, Williams, Sticker, &  
Doyle, P.C

**Debtor's Equity & Officers**

Harry Allison  
James Short  
Jose Pereira

Ken Roane  
Timothy R. Bauer

**Creditors & Parties in Interest**

5718 Westheimer Houston Realty LP  
Acme Truck Line, Inc.  
Ariba Inc.  
AT&T  
Basil Oilfield Service Inc  
Best Western  
BJ Services LLC  
Bosco Oilfield Services  
Braskem S.A.  
Brooks Energy Company  
CalTex Oil Tools LLC  
Conquest Drilling Fluids, Inc.  
Crosby Tugs LLC  
Datavox  
DISA Global Solutions, Inc.  
DTE Energy  
Empire Wireline  
Fanning I.T. Service LLC  
Federal Express  
Frank's International LLC  
Freeport LNG Development, LP  
Gulf Coast Coil Tubing  
Halliburton Energy Services, Inc.  
Hampton Inn & Suites  
Harris County Tax Assessor  
HiTouch Business Services  
Hole Opener Corporation  
Houston Area Safety Council

IronGate Tubular Services  
John Dickson  
John Gibson  
Jordan, Lynch & Cancienne, PLLC  
Knight Oil Tools, Inc  
L&L Oilfield Services  
Marsh Wortham  
Melton & Melton, L.L.P.  
Minuteman Press - Post Oak  
Mobile Mini Inc.  
Moncla Workover & Drilling  
Operations LLC  
Morton Salt, Inc.  
NOV Fluid Control  
Padre Tubular Inc.  
Peart Enterprises, Inc.  
Petro Amigo Supply, Inc.  
Phonoscope Ltd.  
Pioneer Well Services, LLC  
Praxair, Inc  
Premium Oilfield Services LLC  
Public Storage  
Quadient Leasing USA Inc  
R.P.S. Cementing Company LLC  
Receivables Performance  
Management, LLC  
Sabine Resources, Inc.  
Seaboard International Inc.

Seal-Title LLC  
Sonic Surveys, Ltd.  
Sprint Waste Services  
State Tax Advisors LP  
Stellar Drilling Fluids LLC  
Tanner Services LLC  
Texas Labor Law Poster Services  
Texas Mutual Insurance Company  
The Dow Chemical Company  
The Guardian Life Insurance  
Total Safety U.S. Inc.

Totz Ellison & Totz, P.C  
U.S. Small Business Administration  
United HealthCare Insurance  
Company  
United Rentals, Inc.  
Universal Wellhead Services, Inc  
VeriCore, LLC  
Verizon Wireless  
Williams Safety Rescue  
Zions Bancorporation, NA (Amegy  
Bank)

U.S. Bankruptcy Judges and Staff

Chief Judge David R. Jones  
Judge Marvin Isgur  
Judge Christopher M. Lopez  
Judge Jeffrey P. Norman  
Judge Eduardo V. Rodriguez  
Albert Alonzo  
Ana Castro

Tracey Conrad  
Jeannie Chavez  
LinhThu Do  
Tyler Laws  
Kimberly Picota  
Vriana Portillo  
Mario Rios

U.S. Trustee Personnel

Alicia Barcomb  
Jacqueline Boykin  
Luci Johnson-Davis  
Hector Duran  
Barbra Griffin  
Brian Henault  
Linda Motton  
Ha Nguyen  
Glenn Otto  
Yasmin Rivera

Jayson B. Ruff  
Millie Sall  
Patricia Schmidt  
Christy Simmons  
Gwen Smith  
Stephen Statham  
Christopher R. Travis  
Clarissa Waxton  
Jana Whitworth